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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III - 6th & Walnut Sts.
Philadelphia, Pa. 19106

ORIGINAL

(Red) DATE: SEP 20 1984

SUBJECT: Response to 9/7/84 Letter - Morgantown IPA

FROM: Edward Cohen *EC*
Environmental Scientist (3HW13)

TO: Kathy Hodgkiss, Chief
CERCLA Enforcement Section (3HW12)

THRU: Larry S. Miller *LSM* Chief
TSCA/FIFRA Enforcement Section

The "over-pack" portion the company proposes does not seem to meet our requirements for PCB storage.

According to a recent ALJ decision, PCB solids are treated the same as liquids for the Annex III PCB storage requirements.

"Over-packing" (usually 85 gallon barrels) will not suffice because they can not normally meet the requirements for containment of 2 x the internal volume of the largest PCB article or PCB container (barrel).

If the third paragraph of the 9/7/84 letter signifies no curbing in the storage facility then metal leak-tight pans with a minimum of 6" height and acceptable containment volume will suffice in the storage building provided. The volume containment requirement of PCB storage for disposal is 2 x the internal volume of the largest PCB item stored or 25% of the internal volume of all items stored, whichever is greater.

It is above the flood plain and has adequate roof and walls.
See 761.65(b) requirements.

For large volume clean-up exceptions to the barrels requirement (over 1-2 trucks) we allow through enforcement discretion dumpsters lined with 10mil polyethylene, filled, sealed and tarped. No storage of the full dumpsters will be allowed unless not filled by end of day and only at EPA discretion. This exception has to be applied for in writing to 3HW13 and we usually grant it after discussion with the Project Officer.

AR300007

*Morgantown Industrial Park Associates,
Limited Partnership*

*Morgantown Industrial Park
1000 DuPont Road, Building 510
Morgantown, West Virginia 26505-9654
Phone 304/292-9453*

ORIGINAL
(Red)

September 7, 1984

Edward Cohen
Division III H W 13
U.S. Environmental Protection Agency
Curtis Building
6th & Walnut Street
Philadelphia, PA 19106

Dear Mr. Cohen:

Per Morgantown Industrial Park Associates, Ltd. P. discussions with Susan Belsky, Region III TAT, I am providing the following information:

Under the supervision of Jerry Saseen, Wheeling EPA, Morgantown Industrial Park Associates, Ltd. P. removed 4½ drums of possible PCB contaminated soil from an area EPA contractor, Ecology and Environment, found 229 ppm. Drum samples were taken and are currently being tested. Based upon EPA direction, three soil samples were taken and split with EPA to determine if area was clean. Morgantown Industrial Park Associates, Ltd. P. test results should be returned within two weeks of this date while EPA's portion of the split should be returned within three weeks.

The possible contaminated soil was placed in 5 "over-pack" drums awaiting final test results to determine disposal methods. They are being labeled as if they all contain PCB's until tests are returned with date of storage on the drums and kept in a storage building with no drains and curbing. It is being posted as a "PCB Storage Area" "Possible PCB Contaminated Area" "KEEP OUT". It is above the flood plain. Morgantown Industrial Park plans to check the area weekly.

Current plans call for removal within 60 days should all testing, current amount of removal and obtaining an EPA method of proper disposal go successfully. Should these items not proceed as currently expected, is there a method of gaining a little extra time should additional removal or testing be required or should our date of removal due to disposal timing not fall within the 60 day time frame. At this time, we do not see a problem and want to expedite the matter as quickly as possible, but there are several areas (testing, EPA approvals, additional removal required, disposal dates) which do not fall within our control. Thus, we ask the question.

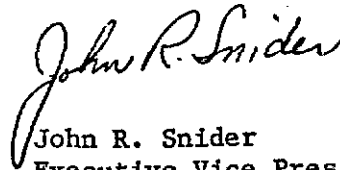
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Edward Cohen
September 7, 1984

Should you desire additional information regarding our methods or have any suggestions, please contact me. Thanking you in advance for your reply to our inquiry.

Sincerely,



John R. Snider
Executive Vice President
Morgantown Industrial Park, Inc.
General Partner

JRS/lds

cc Steve Wassersaug✓

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